



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3140

OFFICE OF
AIR AND WASTE

Mr. Jason Evens
General Manager
US Ecology Idaho
20400 Lemley Road
Grand View, Idaho 83624

Re: TSCA Facility Inventory Status and Information Request Response
US Ecology Idaho, Inc. Grand View, Idaho
Environmental Protection Agency ID No. IDD073114654

Dear Mr. Evens:

The U.S. Environmental Protection Agency has received the above referenced report (Report) dated December 31, 2018. The Report was provided in response to EPA's December 3, 2018 letter requiring a report of the current inventory of TSCA waste in storage at the US Ecology Idaho, Inc. Grand View, Idaho facility and a brief description of the operational status for each polychlorinated biphenyl (PCB) unit. The EPA requested the Report after being informed that the PCB Processing Building (PCB Building) was impacted by the November 17, 2018 explosion at the Containment Building.

The Report states that the structural integrity of the PCB Building has been impacted but that it will be repaired instead of being demolished. If the PCB Building can be repaired to function as intended and in compliance with the existing TSCA Approval, the EPA agrees that it does not need to be demolished and therefore updating the current closure plan is not necessary at this time.

The EPA understands that the TSCA waste in storage that cannot be landfilled without treatment or processing will be shipped off-site for proper disposal prior to initiating repair of the PCB Building. The PCB Building must continue to be inspected daily while TSCA waste remains in storage. The EPA must be notified within 24 hours if snow or rain infiltration is observed in the PCB Building during a daily inspection. Such notification may be via e-mail to castrilli.laura@epa.gov. Infiltration reports must be followed by a report of interim measures taken such as ensuring containers are off the floor where precipitation may accumulate, timely removal of accumulated precipitation, and placing tarps over containers that may be impacted by precipitation. Interim measure reports are due within 14 days of infiltration observations. IM reports may also be sent via e-mail to castrilli.laura@epa.gov.

The TSCA waste destined for off-site disposal should be shipped as soon as possible, but no later than 60 days after receipt of this letter to allow for timely repair to the PCB Building. A request for a longer storage time must be accompanied by: 1) an attestation that the daily inspections have shown that rain or snow have not infiltrated the PCB Building, 2) a structural engineer's evaluation and certification that no

further weakening to the PCB Building has occurred, and 3) an updated inventory of remaining TSCA waste that cannot be directly landfilled.

The EPA has received a copy of IDEQ's authorization to conduct direct landfill activities in accordance with IDEQ's February 6, 2018 approval of the Temporary Authorization for a Class 2 Permit Modification Request Interim Phase Direct Disposal Operations (Temporary Authorization). Existing and any new TSCA waste intended for direct landfill disposal must meet waste acceptance criteria in the TSCA approval or Temporary Authorization, as applicable.

The EPA intends to conduct an evaluation of the repaired PCB Building before it can be used to receive new waste or for TSCA waste processing. Please see USEI's TSCA Approval Condition I.O., Certification of Construction or Modification, for information required before the EPA can schedule the evaluation. USEI must allow at least 30 days after submitting the required information for the EPA evaluation to take place. USEI may not receive new TSCA waste that requires storage and/or processing until the EPA informs USEI in writing that it is acceptable to receive new TSCA waste that requires storage and/or processing.

My staff looks forward to continuing to work with you on submitting a Final Updated TSCA Approval application for the USEI facility. Please contact Laura Castrilli by e-mail at castrilli.laura@epa.gov or by telephone at (206) 553-4323 when you are ready to resume work on updating the TSCA Approval renewal application or if you have any questions regarding this letter. As always, please also feel free to contact me at (206) 553-1563 or hamlin.tim@epa.gov.

Sincerely,

Timothy B. Hamlin
Director

cc: Mr. Brian English, IDEQ
Mr. Lon Stewart, IDEQ
Ms. Rebecca Hogaboam, USEI